

1 PHILLIP A. TALBERT
United States Attorney
2 SAM STEFANKI
FRANK RIEBLI
3 Assistant United States Attorneys
501 I Street, Suite 10-100
4 Sacramento, CA 95814
Telephone: (916) 554-2700
5 Facsimile: (916) 554-2900
6 Attorneys for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 CHALONER SAINTILLUS,
15 Defendant.
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CASE NO. 2:20-CR-00213-KJM
UNITED STATES' REQUEST FOR ORDER
AUTHORIZING EARLY DISCLOSURE OF
GRAND JURY INFORMATION

17 Pursuant to Rule 6(e)(3)(E)(i) of the Federal Rules of Criminal Procedure, the United States of
18 America (the "government") requests authorization to disclose grand jury transcripts and their
19 accompanying exhibits related to this case to defendant Chaloner Saintillus earlier than otherwise
20 required under the Jencks Act, 18 U.S.C. § 3500.

21 The Court may authorize disclosure of a grand jury matter "in connection with a judicial
22 proceeding." Fed. R. Crim. P. 6(e)(3)(E)(i). This criminal case qualifies as a judicial proceeding for
23 which the Court may authorize disclosure of grand jury material, because trial is set to begin on
24 December 6, 2022.

25 The government anticipates calling at least one witness to testify at this trial who previously
26 testified or will testify before the grand jury regarding this case. Hence, this witness's testimony before
27 the grand jury is likely to be subject to the government's disclosure obligations under the Jencks Act.
28 See 18 U.S.C. § 3500(b) (requiring government to disclose, upon defendant's request and after witness

1 testifies at trial, any prior statement of that witness which “relates to the subject matter as to which the
2 witness has testified”). To facilitate both parties’ preparation for trial, the government therefore requests
3 that the Court enter the attached proposed order authorizing it to disclose to the defendant transcripts of
4 proceedings before the grand jury in this case, and before the government would otherwise be required
5 to disclose this material under the Jencks Act.

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7 Dated: October 26, 2022

PHILLIP A. TALBERT
United States Attorney

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9 By: /s/ SAM STEFANKI
10 SAM STEFANKI
11 FRANK RIEBLI
12 Assistant United States Attorneys
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